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5 Attorneys for Plaintiff,
 6 Liberty Media Holdings, LLC

7
8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 LIBERTY MEDIA HOLDINGS, LLC)

Case No. 12-cv-00923-LRH-GWF

11 Plaintiff,)

12 vs.)

**MOTION FOR LEAVE TO CONDUCT
IMMEDIATE DISCOVERY**

13 SERGEJ LETYAGIN d/b/a)
 14 SUNPORNO.COM, IDEAL CONSULT,)
 15 LTD., "ADVERT", "CASTA",)
 16 "TRIKSTER", "WORKER", "LIKIS",)
 "TESTER" and DOES 1-50)

17 Defendants)

18
 19 Plaintiff Liberty Media Holdings respectfully requests that the Court issue an Order
 20 granting leave to take immediate discovery. On June 6, 2012, the Court corrected the docket to
 21 list Ideal Consult, Ltd., "advert," "Casta," "Trikster," "worker," "likis," and "tester" as aliases of
 22 Defendant Letyagin. Plaintiff does believe that Ideal Consult, Ltd. is an alter ego of Defendant
 23 Letyagin. Plaintiff also believes that it is very possible that the users posting Liberty's materials
 24 on the SunPorno.com website¹ may have also been Defendant Letyagin. However, at this point
 25 in time, it cannot be determined if these are actually aliases of Letyagin or merely other
 26 individuals acting in concert with Letyagin and his website. Plaintiff seeks leave to conduct

27
 28 ¹ The user names "advert," "Casta," "Trikster," "worker," "likis," and "tester" posted Liberty's
 works on the SunPorno.com website.

1 immediate discovery in order to attempt to determine the true identities of the SunPorno.com
2 posters “advert,” “Casta,” “Trikster,” “worker,” “likis,” and “tester.”

3 Plaintiff could not obtain stipulation for this motion because Plaintiff cannot identify
4 these Defendants, other than with their user names on the SunPorno.com website, until the
5 requested discovery takes place. The relevant defendants have not entered an appearance, thus
6 their concurrence could not be sought. Plaintiff seeks this order so that it may obtain information
7 leading to the identities of these Defendants from Letyagin and the SunPorno.com website. This
8 Motion is based upon the attached Memorandum of Points and Authorities.

9
10 Dated: June 18, 2012

Respectfully Submitted,

s/Marc J. Randazza

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system on June 18, 2012. A copy of these documents has been mailed to Constance M. Alt, Jennifer E. Riden, Evan Marc Fray-Witzer, and Valentin David Gurvits via the addresses on file in Northern District of Iowa Case Number 11-cv-3041. A copy of these documents has also been emailed to webmaster@sunporno.com, clipinspector@gmail.com, tgpalliance@gmail.com, and webmaster@nightangel.com. This service is in compliance with the Order at ECF 9. As no other Defendants have been identified, they cannot be served.

Dated: June 18, 2012

Respectfully Submitted,
s/Marc J. Randazza

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